



City of Coachella



Submitted by
Coachella Valley Regional Water Management Group

January 21, 2009



The Coachella Valley Regional Water Management Group (CVRWMG) is a developing RWMG in the Coachella Valley Management Region, which is located in the Colorado River Funding Area. The CVRWMG completed its organizing MOU in the fall of 2008 and is actively developing its governance structure and preparing its submittal for the RAP.

Through those developmental processes, the CVRWMG has identified two areas in the draft Guidelines that are of concern and they are discussed below. With each concern, we have also noted adjustments in the Guidelines that would be useful in addressing the concern.

Acknowledgement of emerging regions. On Page 4, the draft Guidelines are generous in stating DWR understands that some regions are in the initial phases of development. However, the points made on Page 4 are not echoed in Table 1, which describes what to submit and provides reviewer information.

For example, Item 2 in Table 1 asks for a listing of other participants and their role in developing and implementing the IRWMP. For the CVRWMG, it is premature to list the other participants or their roles. We are actively working toward shaping our expectations on just this issue. Certainly, our RAP submittal can indicate our intention and expectations on involving other participants and their roles and we are glad to provide that.

As we read Items 3 and 4 in Table 1, we note similar wording regarding the involvement of stakeholders, especially DACs, and public outreach efforts. Here again, the language does not clearly accommodate emerging regions.

As information, the CVRWMG has adopted a consensus-seeking decision style and the consensus process requires that we address and resolve concerns of all the parties. This approach requires more time and it is a trade off we gladly make in order to have a lasting agreement.

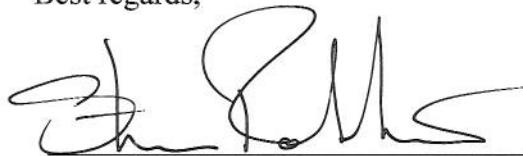
Comments on Draft IRWM Regional Acceptance Process Guidelines

In order to address the issue described above, the CVRWMG suggests that the acknowledgement provided for emerging regions on Page 4 of the draft Guidelines be restated in Table 1, so that it is clear that emerging regions can provide their intentions and expectations and still satisfy the RAP requirements.

RAP Timeline. The timeline provided on Page 7 is our second item of concern. We are pleased to note that the dates denoted in italics are tentative dates. While we do not object to the 30-day public comment period for the draft Guidelines, we believe that a RAP submittal date of 30 days after RAP Guidelines are issued is insufficient, especially for emerging regions. A submittal date of 60 days following release of the Guidelines would be more acceptable.

We appreciate the opportunity to provide these comments and continue to move forward in developing the IRWMP to serve this Coachella Valley Management Region.

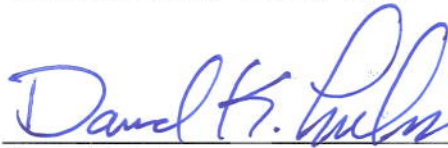
Best regards,



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